

TywaUNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Tywanda Rogers,	)	
	)	
Plaintiff,	)	4:20-cv-04081-SAL
	)	C.A. No: _____
vs.	)	
	)	<b>NOTICE OF REMOVAL</b>
Awesome Products, Inc.,	)	
	)	
Defendant.	)	
	)	

Defendant Awesome Products, Inc. (“Defendant”), through its counsel Laura R. Baer, J. Lucas Richardson, and Christian Stegmaier, of Collins & Lacy, P.C., files this Notice of Removal in the above-captioned case to the United States District Court for the District of South Carolina, Florence Division pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

Defendant would respectfully show unto this Honorable Court:

1. The above-entitled action was brought in the Dillon County Court of Common Pleas by Plaintiff to recover from Defendant a judgment for actual and punitive damages, together with the cost and fees of this action. By virtue of these allegations, Defendant avers the jurisdictional threshold has been satisfied.
  
2. Plaintiff’s Complaint is silent as to the amount in controversy. However, at the time of filing this Notice, counsel for Defendant is informed by Plaintiff’s counsel that Plaintiff would not stipulate to damages not exceeding \$75,000. Based upon this information, Defendant submits there is sufficient evidence that the amount in controversy exceeds the jurisdictional threshold for removal.

3. This action was commenced by the service of a Summons and Complaint against Defendant, which was received by Defendant via Certified Mail on October 26, 2020. The deadline to remove this matter is November 27, 2020.
4. Defendant Awesome Products, Inc. is a foreign corporation. Defendant's state of incorporation is California. Defendant's principal place of business is California. Specifically, Defendant's corporate headquarters are located in Buena Park, CA.
5. Defendant files herewith copies of all process, pleadings, and order served upon them in this action as part of this notice.
6. Defendant will file a copy of this Notice of Removal with the Clerk of Court for Dillon County, South Carolina, and will serve a copy upon counsel for Plaintiff.

WHEREFORE, Defendant Awesome Products, Inc., prays this Honorable Court accept this Notice of Removal that is being filed and that this Honorable Court take jurisdiction of the above-entitled case and all further proceedings in said cause in the Court of Common Pleas, County of Dillon, State of South Carolina be stayed.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,  
COLLINS & LACY, P.C.

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ATTORNEYS FOR DEFENDANT  
AWESOME PRODUCTS, INC.

**NOTICE OF REMOVAL**

Columbia, South Carolina  
November 24, 2020